

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

SHANTE REESE,

Plaintiff,

CASE NO.: 1:23-cv-24670-JAL

v.

ALORICA, INC.,

Defendant.

_____ /

**PROPOSED ORDER GRANTING PLAINTIFF'S SECOND MOTION TO COMPEL
AND FOR SANCTIONS**

THIS CAUSE is before the Court on the Plaintiff's Motion to Compel Defendant's Discovery Responses, for which a hearing was held on June 14, 2024, and the Court, having considered the Motion, and being otherwise fully apprised in the premises, it is hereby **ORDERED AND ADJUDGED** that

1. Plaintiff's Motion is hereby **GRANTED**.
2. The Defendant shall provide its amended responses to Plaintiff's First Set of Interrogatories and Plaintiff's First Request for Production within five (5) days of the date of this order, without objections, in accordance with the Court's June 6, 2024, Order.
3. Plaintiff shall be awarded her attorney's fees and costs incurred incident to filing the Second Motion to Compel and for Sanctions, and those incurred as a result of Defendant's non-appearance at the deposition of its corporate representative. Within seven (7) days of the date of this Order, the Parties shall confer regarding the amount of attorney's fees. Should the Parties not reach an agreement at the conclusion of the seven (7) day period, the Parties must advise the Court, and a briefing schedule on this matter will be issued by the Court thereafter.

DONE AND ORDERED in Chambers in Miami-Dade County, Florida, on this ____ day
of _____ 2024.

THE HONORABLE MARTY FULGUEIRA ELFENBEIN
UNITED STATES MAGISTRATE JUDGE

Copies Furnished to All Counsel of Record